

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION**

RightCHOICE Managed Care, Inc., *et al.*,

Plaintiffs,

v.

Hospital Partners, Inc.; Hospital Laboratory
Partners, LLC; Empower H.I.S. LLC; RAJ
Enterprises of Central Florida, LLC d/b/a Pinnacle
Laboratory Services; Labmed Services, LLC;
Serodynamics, LLC; David Byrns; Jorge Perez;
James F. Porter, Jr.; Beau Gertz; and Mark Blake,

Defendants.

Civil Action No.
5:18-CV-06037-DGK

PLAINTIFFS' MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Plaintiffs, by and through undersigned counsel and in accordance with the Court's
CM/ECF Civil and Criminal Administrative Procedures Manual and Users Guide, respectfully
move the Court for leave to file documents under seal.

In support of this Motion, Plaintiffs state as follows:

1. At trial, Plaintiffs agreed to the Sero Defendants' request that Plaintiffs electronically file the slides Plaintiffs showed to the jury during Plaintiffs' opening statement, closing argument, and rebuttal closing argument.
2. Certain of the exhibits included in these slides have been marked "CONFIDENTIAL" and as such, are required to be filed under seal per the Protective Order.
3. In accordance with the Court's CM/ECF Civil and Criminal Administrative Procedures Manual and Users Guide, Plaintiffs' counsel will e-mail the proposed sealed

documents, together with a proposed Order granting leave to file the same under seal, to the courtroom deputy.

WHEREFORE, for the foregoing reasons, Plaintiffs respectfully request that the Court grant their Motion for Leave to File Documents Under Seal.

Dated: October 1, 2021

By: /s/ Michael L. Jente

LEWIS RICE LLC

Neal F. Perryman, MO Bar #43057
Michael L. Jente, MO Bar #62980
600 Washington Avenue, Suite 2500
St. Louis, Missouri 63101
T: (314) 444-7600
nperryman@lewisrice.com
mjente@lewisrice.com

-and-

ROBINS KAPLAN LLP

Jeffrey S. Gleason (admitted PHV)
Munir R. Meghjee (admitted PHV)
Jason W. Pfeiffer, MO Bar # 50104
Nathaniel J. Moore (admitted PHV)
Jaime J. Wing (admitted PHV)
J. Haynes Hansen (admitted PHV)
800 LaSalle Avenue, Suite 2800
Minneapolis, Minnesota 55402
T: (612) 349-8500
F: (612) 339-4181
jgleason@robinskaplan.com
mmeghjee@robinskaplan.com
jpfeiffer@robinskaplan.com
nmoore@robinskaplan.com
jwing@robinskaplan.com
hhansen@robinskaplan.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed electronically with the United States District Court for the Western District of Missouri, through the Court's CM/ECF system, on the 1st day of October 2021, with notice of case activity sent to counsel of record.

/s/ Michael L. Jente